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Attorneys for Secured Creditor
CROWN HARBOR HOMEOWNERS ASSOCIATION

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In Re:

Ernest Louis Besso and Carrie
Elizabeth Besso,

Debtors.

Chapter 13

Case No. 14-42590
Motion Control No. AT-01

**STIPULATION FOR ADEQUATE
PROTECTION ORDER**

Time: 1:30 p.m.
Date: May 6, 2015
Location: U.S. Bankruptcy Court
1300 Clay Street, 2nd Floor
Courtroom 201
Oakland, CA 94612
Judge: Hon. Roger L. Efremsky

A Motion for Relief from the Automatic Stay (the "Motion") was noticed in the within matter and filed by CROWN HARBOR HOMEOWNERS ASSOCIATION ("Secured Creditor"). The hearing on said Motion was held on May 6, 2015 at 1:30 p.m. before the Honorable Roger Efremsky, United States Bankruptcy Judge.

Debtors, Ernest Louis Besso and Carrie Elizabeth Besso ("Debtors") and Secured Creditor through their respective counsel have agreed to resolve Secured Creditor's Motion pursuant to the following agreement (the "APO"). This Order affects the real property commonly known as 553 Kings Road, Alameda, California 94501 ("the Property").

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IT IS HEREBY ORDERED THAT:

1. Debtors are currently post-petition delinquent in the amount of \$8,926.79 through and including May 1, 2015.

2. Beginning on June 1, 2015, Debtors shall timely tender the regular monthly Association assessments payments of \$455.62 and any other assessment obligation which comes due after the date of this APO. On the first day of each month beginning with June 1, 2015 and lasting for eighteen (18) months (i.e., up to and including November 1, 2016), Debtor shall also pay an additional \$543.16 per month toward their post-petition delinquency, which is inclusive of the \$850.00 in attorneys' fees and costs incurred by the Association in making its Motion, for a total of \$998.78 per month. Payments are to be remitted to: ATC Assessment Collection Group, c/o Nicole Thornsby, 1451 River Park Drive, Suite 125, Sacramento, CA 95815. If Debtors comply with these terms no further late fees will be added.

3. Secured Creditor and/or its agents are authorized to send monthly billing statements/invoices directly to Debtors.

4. In the event Debtors fail to timely perform any obligations set forth in this APO, Secured Creditor shall be entitled to notify Debtors and Debtors' attorney of record of said default in writing with service by facsimile and U.S. Mail. Debtors shall then have ten (10) calendar days from the date of the written notification to cure the default, including paying all costs and attorneys' fees incurred by the Association associated with the default.

5. If Debtors fail to cure the default, Secured Creditor shall be entitled to lodge an Order Terminating the Automatic Stay which includes a waiver of the 14-day stay provided by Bankruptcy Rule 4001(a)(3). A Declaration shall accompany the Order Terminating the Automatic Stay which states that Secured Creditor duly notified Debtors and Debtors' attorney of record of the default and that the default was not timely cured. The Order Terminating the Automatic Stay may be entered without further hearing.

6. Notwithstanding anything contained herein to the contrary, Debtors shall be entitled to a maximum of two (2) notices of default and opportunities to cure pursuant to Paragraph 4. Once Debtors have defaulted a third time on the obligations imposed by this APO

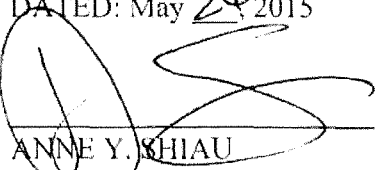
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1 and has been served two prior notices of default, Secured Creditor may immediately submit a
2 proposed Order Terminating the Automatic Stay in accordance with Paragraph 5, without any
3 notice other than what is provided therein. No additional opportunities to cure will be allowed.

4 7. Debtors must remain current on the bankruptcy plan payments as well as the
5 payments set forth in the APO. If Debtors fail to remain current on bankruptcy plan payments,
6 Secured Creditor may immediately submit a proposed Order Terminating the Automatic Stay in
7 accordance with Paragraph 5, without any notice other than what is provided therein.

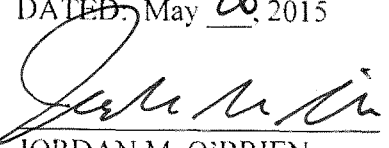
8 8. If a senior lienholder has already obtained or does obtain relief from the automatic
9 stay, Secured Creditor may immediately submit a proposed Order seeking the same relief as
10 obtained by that senior lienholder, without any notice other than what is provided therein.

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13 DATED: May 26, 2015

14 
15 ANNE Y. SHIAU
16 Attorney for Debtors

17 LAW OFFICES OF PATRICK
18 L. FORTS

19 DATED: May 26, 2015

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21 JORDAN M. O'BRIEN
22 Attorney for Secured Creditor

23 *END OF ORDER*

COURT SERVICE LIST

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